

**ICC Neutral Fact Finder**  
**Instructions for Completing Contract Summary Form and Worksheets**

**2001 NEUTRAL FACT-FINDER PROCESS**  
**Instructions for Completing the Contract Summary Form and Worksheets**

**A. Introduction**

Section 16-112(c) of the Illinois Public Utilities Act (the Act) requires that electric utilities and alternative retail electric suppliers (ARES) operating in the State of Illinois provide the Commission-appointed Neutral Fact Finder (NFF) with sufficient information to determine the market value of electric power. For the Year 2001 NFF process, materials for complying with these data requirements include the following:

1. these instructions;
2. a five-page Contract Summary Form; and
3. two hourly data worksheets.

These materials were approved by the Commission in Docket No. 01-0011 on *<insert date>*. The instructions and the five-page Contract Summary Form are included as attachments to the Commission's order. Additionally, all three items are available in electronic format. The instructions are prepared in Word 97 (NFFConSumInst.doc). The five-page Contract Summary Form comprises one Excel Workbook (NFFConSumForm.xls), each page of the form being prepared as a separate worksheet within the workbook. Similarly, the two hourly data worksheets form an additional Excel workbook (NFFHourlyData.xls).

As explained more thoroughly in Section B.5 below, data must be submitted in both hardcopy and electronic formats. As a result, where necessary, these instructions make appropriate references to both.

It is recommended that these Instructions be read in their entirety before any attempt is made to complete the Summary Form and Worksheets.

**B. General Instructions**

**1. Definition of Reporting Entities and Authority to Require Submission of Data**

Pursuant to Section 16-112(c) of the Act, all electric utilities and alternative retail electric suppliers (ARES) operating in the State of Illinois must complete and submit a Contract Summary Form and Worksheets for each reportable contract or group of aggregated reportable contracts.

**2. Reportable Contract Defined and Data Required**

- (a) Subject to the exclusions noted in B3 below, reporting entities must report all required information for each retail or wholesale contract entered into after June 1, 1997 and before May 15, 2001, for:
  - (1) the *sale* of electric power and energy that is either from a generating facility (or facilities) located in the State of Illinois or from a generating facility (or facilities) located in a contiguous State and owned by an electric utility as part of its

interconnected operating system for delivery at any time between January 1, 2002 and December 31, 2006, inclusive, or

- (2) the *purchase* and delivery of electric power and energy in or into the State of Illinois at any time between January 1, 2002 and December 31, 2006, inclusive.
- (b) Reporting entities should include any contract amended or changed after June 1, 1997, in a way that may be material to the determination of market price.
- (c) In addition, any information required by Sections 16-112(c)-(g) of the Act and not specifically requested in the prepared form should be attached and submitted along with the completed form.
- (d) Finally, responding entities are encouraged to provide any additional information that contributes to the NFF's ability to more fully understand the terms of the contract.

### **3. Exclusions**

- (a) Pursuant to Section 16-112(c), the following contracts are not to be summarized:
  - (1) contracts between an electric utility and its affiliate
  - (2) contracts for the sale, purchase, or delivery of electric power made under rates and tariffs filed with the Commission –  
exceptions under (2), which *should* be reported and summarized:
    - (i) contracts for the sale, purchase, or delivery of electric power made under tariffs filed with the Commission pursuant to Section 16-110(d) of the Act;
    - (ii) special or negotiated rate contracts between an electric utility and a retail customer to the extent the contract is for the provision of electric power and energy after the date the customer becomes eligible for delivery services; and
    - (iii) Power Purchase Options –PPO contracts entered into pursuant to Section 16-110(b) are exempt from reporting. However, if the PPO has been assigned and the contract between the reporting entity and the retail customer provides for prices, quantities or terms different from those applicable to a sale by the electric utility to the retail customer as set forth in the electric utility's applicable approved PPO tariffs, the contract must be reported as follows:
      - a) In all cases, if the prices in the contract between the reporting entity and the retail customer are different from the prices provided for in the PPO, the entire contract shall be reported and a check should be placed in the appropriate space provided.
      - b) If the quantity of electricity to be provided under the contract between the reporting entity and the retail customer is greater than the quantity to which the retail customer is entitled under its PPO contract with the electric utility, a contract summary must

be provided for the incremental power and energy over and above the quantities allowed under the PPO and a check should be placed in the appropriate space provided.

- c) If the term of the PPO contract is shorter than the term of the contract between the reporting entity and the retail customer, a contract summary should be provided for the incremental term of the contract that extends beyond the term of the PPO and a check should be placed in the appropriate space provided.

- (3) extensions or amendments to full requirements wholesale contracts existing on December 16, 1997, so long as such contracts, extensions, or amendments are cost of service regulated by the FERC

- (4) swaps need not be summarized, but must be identified as a group of contracts not summarized; option contracts meeting the requirements of Section 16-112(c) should be reported, but must be summarized only when exercised

- (5) an electric utility that sells electric power and energy from generating facilities located in the states contiguous to Illinois and owned by the electric utility as part of its interconnected operating system should not include with its contract summaries sales under rates and tariffs filed with the relevant public utility commission, unless the contract to be summarized is for the provision of electric power and energy after the date the customer becomes eligible for delivery services in such other State; contracts excluded under this paragraph need not be listed as exempt contracts.

- (b) If the reporting entity excludes any contract(s) or groups of contracts under this section, it must provide on Contract Summary Form Page 5/Excel Worksheet "Add'lInfo" a description of the contract(s) or groups of contracts excluded, including the number of such contracts (by group, if applicable) and a clear statement of the reason(s) as to why the contract(s) or groups of contracts are considered to be exempt. Exception: contracts excluded under item 3(a)(5), above.

#### **4. Aggregation**

Reporting parties may aggregate the requested data for groups of contracts that have identical terms and conditions, except such contracts need not be for the same quantity. All customers within the aggregated group must be subject to the same load profile. For example, two contracts for the sale of electric power to separate businesses at \$.07 per kilowatt-hour may be aggregated even though one is for a greater capacity (i.e., a larger business) than the other. However, two contracts, one for a small restaurant and one for a larger restaurant would not be eligible for aggregation, if different load profiles have been developed for the two types of customers, i.e., small restaurants and large restaurants.

#### **5. Submission**

- (a) The Contract Summary Forms and Worksheets must be completed and submitted to the NFF on or before June 1, 2001. The Contract Summary Forms (NFFConSumForm.xls) must be

submitted in hardcopy and electronic formats. The hourly data worksheets (NFFHourlyData.xls) should be submitted in electronic format only.

- (b) All materials, both the hardcopy forms and the diskette(s) or CD-ROMs containing the requested information in electronic format, should be delivered to:

[Name and address of 2001 NFF]

Reporting entities may also submit electronic data via e-mail to [e-mail address of 2001 NFF]. However, such internet transmissions must be followed-up with expedited delivery of diskettes or CD-ROMs containing the same information to the address listed above.

- (c) To aid in assuring the completeness and accuracy of the information provided, reporting entities should also enclose with their submissions a copy of the representation letter attached to these instructions as Exhibit 1, printed on company letterhead and signed by a senior officer (i.e., Vice President or above) of the reporting corporation.
- (d) The NFF will reproduce all information submitted and provide a copy to the ICC staff. Staff will maintain the confidentiality of the information in accordance with the procedures set forth in Schedule [] which is attached to the direct testimony of [staff witness] in Docket 01-0011.

## **6. Retention of Supporting Workpapers**

Reporting entities should retain all workpapers created and/or used in the preparation of the Contract Summary Form for at least two years. Since the ICC has the authority to audit any reporting entity's work, such working papers should be maintained in a well organized and easily accessible manner.

## **7. Authority of the NFF to Seek Additional Information**

It should be noted that the NFF has the authority to seek further information from any reporting entity through the Commission staff, either through the audit process or otherwise.

## **C. Completion of General Contract Information (Summary Form - Page 1; Excel Worksheet "Gen'lInfo")**

1. *Respondent Name* – full name of reporting entity
2. *Respondent Address* – address to which correspondence regarding the Contract Summary Forms should be forwarded.
3. *Contact* – Name and Title of reporting entity representative to whom correspondence, questions, and/or requests for additional information should be directed.

4. *Phone* – Business telephone at which contact may be reached.
5. *Fax* – Business fax number for contact.
6. *E-mail* – internet address for contact.
7. *Respondent Code* – Nine character code comprising the first three letters of the first three words of the reporting entities name. Example: Illinois Power Traders, Inc. = ILLPOWTRA.
8. *Contract Number* – A four-digit number assigned to each reported contract by the reporting entity. Contracts should be numbered sequentially beginning with 0001. If the form is being prepared for a group of contracts with aggregated data, each contract in the group should be numbered sequentially and the *Contract Number* shown on the form should reflect the boundaries of the series, e.g., 0005-0025.
9. *Seller or Purchaser* – Reporting entity should indicate whether it is the seller or the purchaser in the reported contract by placing an “S” or a “P” in the space provided.
10. *Counterparties* – Generally, counterparties need not be identified. However, where the counterparties to a contract are also required to report the agreement pursuant to Section 16-112(c), their names must be provided in the space(s) provided.
11. *Date of Contract* – Indicate the date of the contract, generally the date of execution. (MM-DD-YY)
12. *Effective Date* – Indicate the effective date of the contract. (MM-DD-YY)
13. *Expiration Date* – Indicate the expiration date of the contract, without considering any options for renewal. (MM-DD-YY)
14. *Renewal Dates* – Indicate any renewal dates provided in the contract, past or future. Also indicate the party authorized to exercise the option by circling the appropriate letter, as follows:
  - S = Seller
  - P = Purchaser
  - M = Mutual, i.e., both seller and purchaser
  - C = Conditional (Provide explanation on Contract Summary Form Page 5/Excel Worksheet “Add’lInfo”)
  - O = Other (Provide explanation on Contract Summary Form Page 5/Excel Worksheet “Add’lInfo”)
15. *Purchaser’s Class of Service* –Indicate the purchaser’s class of service by placing a check in the space next to the appropriate option. Class of service options are defined, as follows:
  - A1 Retail – Residential*
  - A2 Retail – Commercial*
  - A3 Retail – Industrial*
  - A4 Retail – Government*
  - A5 Retail Other*

Mark this option if the purchaser is in a retail class other than those noted above. Provide a detailed explanation on Contract Summary Form Page 5/Excel Worksheet "Add'l Info".

*B Wholesale (Sale for Resale)*

If the wholesale contract is for the buy-back of electric power or energy from a generating facility (or facilities) sold by the purchaser, place a check in the appropriate space provided and also provide on Contract Summary Form Page 5/Excel Worksheet "Add'l Info" a description of the plant/facility sold.

*C Other*

Mark this option if the purchaser is in a class other than any of the retail or wholesale classes noted above. Provide a detailed explanation on Contract Summary Form Page 5/Excel Worksheet "Add'l Info".

16. *Power Purchase Options* – As noted above, Power Purchase Options are exempt from reporting. However, if the PPO has been assigned and the contract between the reporting entity and the retail customer provides for prices, quantities or terms different from those applicable to a sale by the electric utility to the retail customer as set forth in the electric utility's applicable approved PPO tariffs, the contract must be reported as follows:

- a) In all cases, if the prices in the contract between the reporting entity and the retail customer are different from the prices provided for in the PPO, the entire contract shall be reported and a check should be placed in the appropriate space provided.
- b) If the quantity of electricity to be provided under the contract between the reporting entity and the retail customer is greater than the quantity to which the retail customer is entitled under its PPO contract with the electric utility, a contract summary must be provided for the incremental power and energy over and above the quantities allowed under the PPO and a check should be placed in the appropriate space provided.
- c) If the term of the PPO contract is shorter than the term of the contract between the reporting entity and the retail customer, a contract summary should be provided for the incremental term of the contract that extends beyond the term of the PPO and a check should be placed in the appropriate space provided.

Additionally, if the reported contract includes a provision for the future assignment of a PPO to the reporting entity, a check should be placed in the appropriate space provided here.

17. *Bundled Service* – Indicate in the space provided whether or not the reported contract provides for bundled service(s). If yes, also provide on Contract Summary Form Page 5/Excel Worksheet "Add'l Info", a detailed description of those services and the methodology employed to unbundle the reported data (with sample calculations). Also indicate whether the contract price reflects any goods, services, or other things of objective value other than electricity and the price paid for electricity.

## **D. Energy Pricing Data**

### **1. Use of Contract Price or Actual Cost**

Section 16-112(f) of the Act requires that market value calculations for electric energy be based on energy prices stated in contracts, “and, where no explicit energy prices or index price basis are stated, on the actual energy costs of the supplier in the corresponding period of the preceding year that would have been applicable to the electric energy provided under the contract.” This should be read as requiring information from the most recent corresponding period for which information is available as of May 1, 2001. For example, if the contract period for which the price of energy must be determined is March 2002, use the actual information from March 2001, if available. Otherwise, use actual information from March 2000. If, on the other hand, the contract period from which the price of energy must be determined is June through September of 2002, then use the actual information from 2000, because it is the most recent corresponding period for which information is available. If the contract period for which the price of energy must be determined is January through August of 2002, then use actual information from any corresponding months in 2001 for which it is available, and 2000 information for all other months. The method for calculating actual cost should be consistent with the method utilized in the contract.

## **2. Pricing Interconnection Point**

Pursuant to Section 16-112(c):

- (a) For contracts for the sale of electric power and energy from a generating facility (or facilities) located in Illinois, or located in a contiguous State and owned by an electric utility as part of its interconnected operating system, prices or charges for electric power and energy reported as applicable are those stated at the point at which the electric power or energy leaves the transmission system of the electric utility or ARES.
- (b) For contracts for the purchase and delivery of electric power and energy in or into the State of Illinois, prices or charges for electric power or energy reported as applicable are those stated at the point at which the electric power or energy enters the transmission system of the electric utility.
- (c) For contracts for the sale of electric power and energy generated for delivery within the electric utility’s service area, prices or charges for electric power and energy reported as applicable are those stated at the point at which the electric power and electric energy enters the electric utility’s transmission system (i.e., the bus bar).

## **3. Treatment of Bundled Service Contract Prices**

As required by Section 16-112(c), reporting entities are to deduct delivery service charges (including transition charges as defined and set forth in applicable tariffs that are in effect at the time the reporting entity’s data is submitted), and charges for services, if any, other than the provision of power and energy or delivery services, from bundled service contract prices reported to the NFF. If the contract to be unbundled includes deliveries of power and energy after December 31, 2002, the current Commission-approved transition charge should be reduced if necessary to reflect the appropriate mitigation factor for years subsequent to 2002, as set forth in 220 ILCS 5/16-102. For contracts which must be unbundled, reporting entities must:

- (a) describe (on Contract Summary Form Page 5/Excel Worksheet “Add’lInfo” ) the nature of the bundled services and explain in detail how the charges for services other than energy and power/capacity were determined and deducted from the contract price, and
- (b) report the price before (bundled) and after (unbundled) the deduction of Delivery Service, Transition (CTC), or other charges, separately identifying the component parts (e.g., market value, delivery services, and transition charge) , their values, and their source(s), e.g., tariff citation.
- (c) when calculating unbundled contract prices for electricity, begin by converting all demand-based charges and customer charges to being expressed as charges for energy (that is, per kWh charges) by calculating the total demand and/or customer service charge revenues in each pricing period and dividing by the total kWh of usage in the pricing period applicable to the charge (i.e., all hours for a customer service charge or monthly demand charge, peak hours for a peak demand charge) and adding all charges from the bundled contract that are already expressed as charges for energy, to calculate the bundled contract charge for each pricing period. Then, when deducting delivery service charges, transition charges, or both, convert all demand charges for electric power and all demand-based components of the delivery service charge, including any customer charges, to an energy charge by calculating the total demand and/or customer service charge revenues in each pricing period and dividing by the total kWh of usage in the pricing period applicable to the charge (i.e., all hours for a customer service charge or monthly demand charge, peak hours for a peak demand charge).-

#### **4. Completion of Summary Form - Page 2/Excel Worksheet “EnergyPricing”**

- (a) In Part A of Summary Form - Page 2/Excel Worksheet “EnergyPricing”, provide a full and complete description of the calendar and time parameters associated with each pricing period. The pricing periods reported should correspond to the periods specified in the contract. Descriptions should include the beginning and ending dates and times of each pricing period with all times reported as Central Standard Time or Central Daylight Time, whichever is in effect under the Time Standardization Act (5 ILCS 440). A description must be provided for every pricing period in the contract. Add rows to accommodate additional periods, as required.

Examples:

Period A	Summer (6-1 through 9-30); On-Peak (6 AM to 10 PM, M-F)
Period B	Summer (6-1 through 9-30); Off-Peak
Period C	Non-Summer; On-Peak (6 AM to 10 PM, M-F)
Period D	Non-Summer; Off-Peak

- (b) In Part B of Summary Form - Page 2/Excel Worksheet “EnergyPricing”, pricing data for each price block within each pricing period in the contract. Again, the pricing blocks and periods reported should correspond to the pricing blocks and periods specified in the contract. Pricing information should be reported in dollars per megawatt hour. A price must be provided for every pricing block and period in the contract. Add rows to accommodate additional blocks or periods,



as required. When multiple prices apply on a volumetric basis during a pricing period or when “blocked” rates apply to a period, the weighted average prices will be identified for each period in addition to the individual and/or “blocked” prices. For purposes of this section, “blocked” means that the price varies over a period(s) based on volume or some variable other than time.

- (c) For contracts that base price on an index or indices, on Contract Summary Form Page 5/Excel Worksheet “Add’Info”:
- (i) report the index or indices by name and source;
  - (ii) explain in detail how the index is or indices are used in calculating prices;
  - (iii) provide any information, such as weight and base prices, necessary to properly apply the index or indices under the contract’s provisions; and
  - (iv) provide a sample calculation.

## **E. Capacity Pricing/Usage Data**

### **Completion of Summary Form - Page 3/Excel Worksheet “CapacityPricing”**

- (a) In Part A of Summary Form - Page 3/Excel Worksheet “CapacityPricing”, provide a full and complete description of the quantity and the calendar and time parameters associated with each pricing block in each pricing period. The pricing blocks and periods reported should correspond to the pricing blocks and periods specified in the contract. Descriptions should include the beginning and ending dates and times of each pricing period with all times reported as Central Standard Time or Central Daylight Time, whichever is in effect under the Time Standardization Act (5ILCS 440). A description must be provided for every pricing block and period in the contract. Add rows to accommodate additional pricing blocks or periods, as required.

Examples:

Period A	Summer (6-1 through 9-30); On-Peak (6 AM to 10 PM, M-F)
Period B	Summer (6-1 through 9-30); Off-Peak
Period C	Non-Summer; On-Peak (6 AM to 10 PM, M-F)
Period D	Non-Summer; Off-Peak

- (b) In Part B of Summary Form - Page 3/Excel Worksheet “CapacityPricing”, provide pricing and usage/quantity data for each pricing period in the contract.
- (i) *Pricing* - Again, the pricing periods reported should correspond to the periods specified in the contract. Pricing information should be reported in dollars per megawatt. A price must be provided for every pricing period in the contract. Add rows to accommodate additional periods, as required.
  - (ii) *Quantity* - For contracts involving demand customers, reporting entities must provide the NFF with expected usage data for the periods for which the NFF will determine the market value of electric power, i.e., January 1, 2002 through December 31, 2006. It is expected that such usage data will be based upon actual historic meter readings. For example, if the demand price is based on the highest meter reading of the

month, that data should be reported. If peak and off-peak periods apply, all such data should be reported. If for some reason, meter readings are unavailable and some other source is utilized, the reporting entity must provide (on Contract Summary Form Page 5/Excel Worksheet "Add'l Info") a full and complete description of that source and an complete explanation as to the methodology employed to translate data from that source to the usage data submitted.

## **F. Reliability/Interruptibility**

### **Completion of Summary Form - Page 4/Excel Worksheet "Reliability"**

- (a) The applicable reliability level(s) must be reported for all pricing periods in the contract that fall between January 1, 2002 and December 31, 2006. Add rows to accommodate additional periods, as required.
- (b) In reporting the level of reliability, determine and define each level or category of reliability, e.g., Firm (same reliability as native load firm), Marketer Firm (interruptible, but with liquidated damages), other type of firm (specify), or type of non-firm (all other transactions - specify), and designate each with a capital letter, e.g., A, B, C, etc. Also provide information regarding the performance obligations of the selling entity.
- (c) Additional characteristics of energy, power, reliability, or any other characteristic with an impact on prices or charges should be reported on Contract Summary Form Page 5/Excel Worksheet "Add'l Info".

## **G. Additional Information**

### **Completion of Summary Form - Page 5/Excel Worksheet "Add'l Info"**

Provide additional information, as appropriate and required, on the following items:

- (a) Contract or groups of contract excluded from reporting. (B3(b))
- (b) Explanation of "Conditional" under Renewal Date. (C14)
- (c) Explanation of "Other" under Renewal Date. (C14)
- (d) Explanation of "Retail Other" under Customer Class. (C15)
- (e) Description of facilities sold. (C15)
- (f) Explanation of "Other" under Customer Class. (C15)
- (g) Description of Bundled Services and price unbundling methodology. (C17)
- (h) Nature and pricing of Bundled Services. (D3(a))
- (i) Prices based upon index or indices. (D4(c))
- (j) Source of usage data other than meter readings. (E(b)(ii), I(a) and I(b)(4))
- (k) Characteristics of energy affecting price. (F(c))
- (l) Methodology used to develop load profiles. (I(c))
- (m) Usage normalization. (I(d))
- (n) Explanation of pricing on holidays and list of holidays. (H(c))

- (o) Any other information that contributes to the NFF's ability to more fully understand the terms of the contract.

## **H. Energy Pricing - Completion of Excel Worksheet "Hourly Pricing Data"**

- (a) Due to its size, a blank of this page of the Summary Form is not provided in hardcopy format, nor is it expected that a completed version will be delivered in hardcopy. However, a completed electronic version is required.
- (b) Based upon the period pricing information provided in Parts A and B of Summary Form Page 2/Excel Worksheet "PricingData", the reporting entity should complete Excel Worksheet "HourlyPrices", filling in the price of each hour for every day of the year. Pricing information should be reported in dollars per megawatt hour. A price must be provided for every hour of every day. When multiple prices and/or "blocked" prices apply in a period, the weighted average price will be that displayed in the "HourlyPrices" under this section. For purposes of this section, "blocked" means that the price varies over a period(s) based on volume or some variable other than time.
- (c) Note holidays with holiday pricing by placing an "H" in the blank column to the right of the date.

## **I. Energy Usage - Completion of Excel Worksheet "Hourly Usage Data"**

- (a) Reporting entities must provide the NFF with expected hourly usage data for each reported contract for the periods for which the NFF will determine the market value of electric power, i.e., January 1, 2002 through December 31, 2006. It is expected that such usage data will be based upon actual historic meter readings. However, if such readings are unavailable and some other source is utilized, the reporting entity must provide (on Contract Summary Form Page 5/Excel Worksheet "Add'l Info") a full and complete description of that source and a complete explanation as to the methodology employed to translate data from that source to the usage data submitted.
- (b) Historic meter readings should be used as the basis for usage data. Such readings include:
  - (1) *Hourly Meter Readings* – If such readings are available, they should be used as the basis for calculating hourly usage.
  - (2) *On-Peak/Off-Peak Meter Readings* – If such readings are employed, the reporting entity must also use applicable load profiles to distribute on-peak usage over the on-peak hours as defined in the contract and off-peak usage over the off-peak hours as defined in the contract.
  - (3) *Monthly Meter Readings* – Similarly, if such readings are employed, the reporting entity must use applicable load profiles for the appropriate customer class to distribute usage.
  - (4) *Other Meter Readings* – If some other meter reading is used as the basis for calculating usage, a brief description of the readings and the methodology used to calculate

usage from them should be provided on Contract Summary Form Page 5/Excel Worksheet “Add’lInfo”

- (c) *On Use of Load Profiles* – Load profiles have been developed by the electric utilities operating in the State of Illinois and are available for use by reporting entities for these purposes. Care should be taken in selecting the profile that best describes the customer being served. If any other load profiles are used to develop the usage data reported to the NFF, a brief description of the source of and/or methodology used to develop the profile should be provided on Contract Summary Form Page 5/Excel Worksheet “Add’lInfo”. In all cases, the specific source of the load profile applied shall be identified.
- (d) *Known Adjustments* – If usage data is normalized to account for severe weather, known manufacturing plant shut-downs, or and other significant event, a detailed explanation of the normalization factor employed and its development should be provided on Contract Summary Form Page 5/Excel Worksheet “Add’lInfo”.

**2001 NEUTRAL FACT-FINDER PROCESS**  
**Instructions for Completing Contract Summary Form and Worksheets – Exhibit 1**  
**Reporting Entity Representation Letter**

[To Be Reprinted On Company Letterhead]

[Name and address of 2001 NFF]

Dear [2001 NFF]:

Please be advised that with respect to the information provided by [Company's Name] to the 2001 neutral fact-finder pursuant to Section 16-112 of the Illinois Public Utilities Act for purposes of determining the market value of electric power and energy,

- (1) we acknowledge that the neutral fact-finder is relying on the contract summaries and related responses to questions regarding contract summaries provided by [Company Name], and
- (2) to the best of my knowledge and belief, (a) all information required to be provided by [Company Name] to the neutral fact-finder pursuant to the Act was so provided and (b) the information described in (1), which we provided to the neutral fact-finder, was prepared in accordance with the requirements of Section 16-112(c) of the Act and related Order dated xxx of the Commission in Docket No. 01-0011 and, in that regard, is complete and accurate. In each instance when information was based on historical data (i.e. historical cost or quantity) such information is based on the most current actual amounts, from the corresponding period in the most recent 12 months for which information is available, at the time such data was provided. In each instance when quantities were estimated (i.e. projected usage data) due care was taken to provide the best estimates available.

Yours truly,

Name, Title